



Order Filed on April 16, 2019 by  
Clerk U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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IN RE:

Mark A. Jones

Debtor(s)

Case No.: 18-18442

Chapter 13

Hearing Date: March 26, 2019

Judge: Jerrold N. Poslusny Jr.

**CONSENT ORDER RESOLVING MOTION TO VACATE STAY**

The consent order set forth on the following pages, numbered two (2) through three (3), is hereby **ORDERED**.

**DATED: April 16, 2019**

A handwritten signature in dark ink, appearing to read "Jerrold N. Poslusny, Jr.", written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

Applicant: BSI Financial Services  
Applicant's Counsel: Friedman Vartolo LLP  
Debtor's Counsel: Moshe Rothenberg, Esq.  
Property Involved("Collateral"): 628 Main Street, Leesburg, NJ 08327  
Relief sought:

✓ Motion for relief from the automatic stay  
Motion to dismiss  
Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Applicant's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- The Debtor is overdue for 11 months, from May 1, 2018 to March 1, 2019.
- The Debtor is overdue for 11 payments at \$1,913.01 per month.
- Less Funds held in debtor(s) suspense (\$0.00).

Total Arrearages Due \$21,043.11

2. Debtor must cure all post-petition arrearages, as follows:

- Immediate payment shall be made in the amount of \$9,000.00. Payment shall be made no later than April 15, 2019.
- Beginning on April 15, 2019, additional monthly cure payments shall be made in the amount of \$2,007.19 for six (6) months.
- Beginning on April 1, 2019, regular monthly mortgage payments shall continue to be made in the amount of \$1,913.01 per month.

3. Payments to the Secured Creditor shall be made to the following address(es):

- ✓ Regular monthly payment: BSI Financial Services  
314 S. Franklin Street  
Titusville, PA 16354
- ✓ Monthly cure and lump sum payment: BSI Financial Services  
314 S. Franklin Street  
Titusville, PA 16354

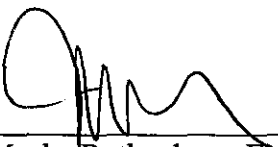
In the event of Default:

If the Debtors fail to make the immediate payment specified above or fail to make regular monthly payments or the additional monthly cure payment within thirty (30) days of the date the payments are due, then the Secured Creditor may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, Certification specifying the Debtors' failure to comply with this Order. At the time the Certification is filed with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and the Debtors' Attorney.

4. Award of Attorney's Fees:

✓ The Applicant is awarded attorney's fees of \$350.00, and costs of \$181.00.  
The fees and costs are payable through the Chapter 13 plan.

The undersigned hereby consent to the form and entry of the foregoing order

  
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Moshe Rothenberg, Esq.  
*Attorney for Debtor*

/s/ Jonathan Schwalb, Esq.  
Jonathan Schwalb, Esq.  
*Attorney for Secured Creditor*